

UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE	
Case <b>16-CA-310918</b>	Date Filed <b>1/24/2023</b>

## INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

## 1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Cognizant; Google, LLC/Alphabet, Inc. (as joint employers)		(b) (6), (b) (7)(C)	
		c. Cell No.	
		f. Fax No.	
d. Address (Street, city, state, and ZIP code) Cognizant, 717 E Parmer Lane, Austin, TX 78729; Google, LLC/Alphabet, Inc., 7700 W Parmer Lane, Austin, TX 78729	(b) (6), (b) (7)(C) ye (b) (6), (b) (7)(C)	g. e-mail (b) (6), (b) (7)(C)@cognizant.com (b) (6), (b) (7)(C)@google.com	
		h. Number of workers employed 58	
i. Type of Establishment (factory, mine, wholesaler, etc.) Technology	j. Identify principal product or service Technology		

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) 3 of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)  
--See additional page--

3. Full name of party filing charge (if labor organization, give full name, including local name and number)  
Anne Barnett, Alphabet Workers Union-CWA

4a. Address (Street and number, city, state, and ZIP code) 155 West Road Portsmouth, New Hampshire 03801	4b. Tel. No. (866) 206-6086
	4c. Cell No.
	4d. Fax No.
	4e. e-mail anne@alphabetworkersunion.org

5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)

6. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.  /s/ Karla M. Campbell  (signature of representative or person making charge)		Tel. No. (615) 254-8801
Karla Campbell, Attorney  (Print/type name and title or office, if any)		Office, if any, Cell No.
		Fax No. (615) 255-5419
Address 223 Rosa L Parks Avenue, Suite 200, Nashville, TN 37203 Date Jan 24, 2023		e-mail karlac@bsjfirm.com

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)  
PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

## **Basis of the Charge**

### **8(a)(1); 8(a)(3)**

Within the last three months since filing a petition for an NLRB election, the employers have unilaterally moved work from the petitioned-for unit to other offices, including an overseas office in India, to chill the union organizing effort.

### **8(a)(1)**

Within the last three months since filing a petition or an election, and within the context of a meeting with workers to discuss the organizing effort, (b) (6), (b) (7)(C) has made an implied threat of reprisal that the employees' work can be easily transferred to other offices in the case of an "emergency."

### **8(a)(1)**

Within the last three months since filing a petition or an election, and within the context of a meeting with workers to discuss the organizing effort, (b) (6), (b) (7)(C) has made a threat of reprisal that bringing in a union would stifle (b) (6), (b) (7)(C) relationship with employees, that the organizing drive has created a "brick wall," and (b) (6), (b) (7)(C) "not sure that it's going to work for everyone" if the union is voted in.

### **8(a)(1)**

Within the last three months, the employers have unilaterally changed workplace policies and their enforcement in response to the union effort. Specifically, the employers have now stated that failure to comply with the newly-promulgated return to office policy will be treated as "job abandonment" and a "voluntary termination," a clear departure from prior policy or prior disciplinary policies.

### **8(a)(1)**

Within the last three months, the employers have failed to maintain the status quo during the pendency of an NLRB representation case petition by imposing a return to office policy.

UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
FIRST AMENDED **CHARGE AGAINST EMPLOYER**

DO NOT WRITE IN THIS SPACE

Case  
**16-CA-310918**Date Filed  
**2/1/2023****INSTRUCTIONS:**

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

## 1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Cognizant; Google, LLC/Alphabet, Inc. (as joint employers)		(b) (6), (b) (7)(C)
		c. Cell No.
		f. Fax No.
d. Address (Street, city, state, and ZIP code) Cognizant, 717 E Parmer Lane, Austin, TX 78729; Google, LLC/Alphabet, Inc., 7700 W Parmer Lane, Austin, TX 78729	(b) (6), (b) (7)(C) representative (b) (6), (b) (7)(C) (Google) (b) (6), (b) (7)(C) (Cognizant)	g. e-mail (b) (6), (b) (7)(C)@cognizant.com; (b) (6), (b) (7)(C)@google.com
		h. Number of workers employed 58
i. Type of Establishment (factory, mine, wholesaler, etc.) Technology	j. Identify principal product or service Technology	

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) 3 of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)  
--See additional page--

3. Full name of party filing charge (if labor organization, give full name, including local name and number)  
Anne Barnett, Alphabet Workers Union-CWA

4a. Address (Street and number, city, state, and ZIP code) 155 West Road Portsmouth, New Hampshire 03801	4b. Tel. No. (866) 206-6086
	4c. Cell No.
	4d. Fax No.
	4e. e-mail anne@alphabetworkersunion.org

5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)

## 6. DECLARATION

I declare that I have read the above charge and that the statements  
are true to the best of my knowledge and belief.

/s/

Karla Campbell, Attorney

(signature of representative or person making charge)

(Print/type name and title or office, if any)

Tel. No.  
(615) 254-8801

Office, if any, Cell No.

Fax No.  
(615) 255-5419e-mail  
karlac@bsjfirm.com

Address 223 Rosa L Parks Avenue, Suite 200, Nashville, TN 37203 Date 2/1/2023

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)  
PRIVACY ACT STATEMENT**

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## **Basis of the Charge**

### **8(a)(1); 8(a)(3)**

Within the last three months since filing a petition for an NLRB election, the employers have unilaterally moved work from the petitioned-for unit to other offices, including an overseas office in India, to chill the union organizing effort.

### **8(a)(1)**

Within the last three months since filing a petition or an election, and within the context of a meeting with workers to discuss the organizing effort, (b) (6), (b) (7)(C) has made an implied threat of reprisal that the employees' work can be easily transferred to other offices in the case of an "emergency."

### **8(a)(1)**

Within the last three months since filing a petition or an election, and within the context of a meeting with workers to discuss the organizing effort, (b) (6), (b) (7)(C) has made a threat of reprisal that bringing in a union would stifle (b) (6), (b) (7)(C) relationship with employees, that the organizing drive has created a "brick wall," and (b) (6), (b) (7)(C) "not sure that it's going to work for everyone" if the union is voted in.

### **8(a)(1)**

Within the last three months, the employers have unilaterally changed workplace policies and their enforcement in response to the union effort. Specifically, the employers have now stated that failure to comply with the newly-promulgated return to office policy will be treated as "job abandonment" and a "voluntary termination," a clear departure from prior policy or prior disciplinary policies.

### **8(a)(1)**

Within the last three months, the employers have failed to maintain the status quo during the pendency of an NLRB representation case petition by imposing a return to office policy.

### **8(a)(1)**

Cognizant/Google's policies concerning recording are overbroad and unlawfully chill employees' ability to engage in protected concerted activities.

**\*\*\* Amended Allegations \*\*\***

**8(a)(1)**

After being notified that the petitioned-for unit is considering resorting to collective action in response to the Employers' recent unfair labor practices, the Employers immediately offered bargaining unit employees an extended severance and work from home option if they agreed to leave covered employment, in order to discourage employees from engaging in any protected concerted activity.

The Union requests that the Region seeks 10(j) relief and a *Gissel* Bargaining Order.



UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE

Case

16-CA-317404

Date Filed

5/3/2023

## INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

## 1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Cognizant; Google, LLC/Alphabet, Inc. (as joint employers)		b. Tel. No. (b) (6), (b) (7)(C); (b) (6), (b) (7)(C)
		c. Cell No.
		f. Fax No.
d. Address (Street, city, state, and ZIP code) Cognizant, 717 E Parmer Lane, Austin, TX 78729; Google, LLC/Alphabet, Inc., 7700 W Parmer Lane, Austin, TX 78729	e. Employer Representative (b) (6), (b) (7)(C) (Google) (b) (6), (b) (7)(C) (Cognizant)	g. e-mail (b) (6), (b) (7)(C) @cognizant.com; (b) (6), (b) (7)(C) @google.com
		h. Number of workers employed 49
i. Type of Establishment (factory, mine, wholesaler, etc.) Technology	j. Identify principal product or service Technology	

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) 3 of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

## 2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

Because of employee (b) (6), (b) (7)(C) union activity, the employers refused to engage in an interactive process with (b) (6), (b) (7)(C) after (b) (6), (b) (7)(C) requested an accommodation for (b) (6), (b) (7)(C) to work from home. On (b) (6), (b) (7)(C) 2023, after making (b) (6), (b) (7)(C) request for an accommodation, (b) (6), (b) (7)(C) was told (b) (6), (b) (7)(C) will be forced into an extended severance (being placed on "the bench"), effectively a constructive discharge. Employees who did not outwardly support the union have been granted work from home accommodations and were not forced into an extended severance. On (b) (6), (b) (7)(C) 2023, (b) (6), (b) (7)(C) was officially placed on the bench.

## 3. Full name of party filing charge (if labor organization, give full name, including local name and number)

Anne Barnett Alphabet Workers Union-CWA

## 4a. Address (Street and number, city, state, and ZIP code)

155 West Road  
Portsmouth, New Hampshire 03801

## 4b. Tel. No.

(866) 206-6086

## 4c. Cell No.

## 4d. Fax No.

## 4e. e-mail

anne@alphabetworkersunion.org

## 5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)

## 6. DECLARATION

I declare that I have read the above charge and that the statements  
are true to the best of my knowledge and belief.

/s/

Karla Campbell, Attorney

(signature of representative or person making charge)

(Print/type name and title or office, if any)

## Tel. No.

(615) 254-8801

## Office, if any, Cell No.

## Fax No.

(615) 255-5419

## e-mail

kcampbell@stranchlaw.com

Address 223 Rosa L Parks Avenue, Suite 200, Nashville, TN 37203

Date 5/3/2023

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UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE

Case

32-CA-313565

Date Filed

02-28-2023

## INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

## 1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer

Google LLC

b. Tel. No.

6532530000

c. Cell No.

f. Fax No.

d. Address (Street, city, state, and ZIP code)

1001 Shoreline Blvd, Mountain View, CA 94043

e. Employer Representative

g. e-mail

h. Number of workers employed

170,000

i. Type of Establishment (factory, mine, wholesaler, etc.)

j. Identify principal product or service  
Techonology, Internet.

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

## 2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

Google LLC has been using unlawful surveillance technology on me and my family since (b) (6), (b) (7)(C). This includes monitoring all personal devices/ personal cell phones, personal emails, location tracking, and social media. I was recently laid off on (b) (6), (b) (7)(C) 23.

## 3. Full name of party filing charge (if labor organization, give full name, including local name and number)

(b) (6), (b) (7)(C)

4a. Address (Street and number, city, state, and ZIP code)

(b) (6), (b) (7)(C)

4b. Tel. No.

4c. Cell No.

(b) (6), (b) (7)(C)

4d. Fax No.

4e. e-mail

(b) (6), (b) (7)(C)

## 5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)

## 6. DECLARATION

I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

(signature of representative or person making charge)

(Print/type name and title or office, if any)

Tel. No.

Office, if any, Cell No.

(b) (6), (b) (7)(C)

Fax No.

e-mail

(b) (6), (b) (7)(C)

Address

(b) (6), (b) (7)(C)

Date 2/28/2023

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